

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  
ASHINC Corporation, *et al.*,  
Debtors.

American Private Equity Partners II,  
LP, *et al.*,  
Petitioners,  
v.  
Catherine E. Youngman, Litigation  
Trustee for ASHINC Corporation,  
Respondent.

Chapter 11

Civil Action No. 22-cv-302-CFC  
Bankruptcy Case No. 12-11564  
Adv. Proc. No. 21-51179-MFW

**REQUEST FOR ORAL ARGUMENT**

Pursuant to District of Delaware Local Rule 7.1.4, Catherine E. Youngman, in her capacity as the Litigation Trustee and Plan Administrator (the “Trustee”), respectfully requests oral argument with respect to the following Motions To Dismiss:

- The Board of Fire and Police Pension Commissioners’ and The Board of Administration of the Los Angeles City Employees’ Retirement System’s Motion to Dismiss (D.I. 20);
- The Limited Partner Defendants’ Motion To Dismiss The Adversary Complaint (D.I. 22); and
- Yucaipa American Alliance Fund I, LLC and Yucaipa American Management, LLC’s Motion To Dismiss Complaint (D.I. 29).

Respectfully submitted,

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Dated: September 20, 2022